

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENWOOD DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO.: 8:22-00503-TMC

v.

  
WENONA KOREA WELLS  
SECORIA TALKIA JEMISON

**MOTION FOR DISCLOSURE ORDER**

The United States of America, by and through its undersigned Assistant United States Attorney, hereby moves this Court for an Order authorizing disclosure of income tax return and return information. On the United States' motion for an Ex Parte Order authorizing the Internal Revenue Service to disclose income tax returns and return information filed by the above named defendants for the tax years December 31, 2018 through December 31, 2020, the Court signed an Ex Parte Order authorizing the requested disclosure on November 10, 2021. In anticipation of trial the Government respectfully requests authorization to disclose the income tax return and return information provided pursuant to the Court's Order to counsel for the defendants for the following reasons:

The United States represents that disclosure of these matters is necessary in order to permit the parties to engage in meaningful pre-trial discovery and any plea negotiations, and further that the matters sought to be disclosed are those which otherwise may be subsequently provided to the defendant and counsel pursuant to Title 18 United States Code, Section 3500, and Rules 16 and 26.2 of the Federal Rules of Criminal Procedure. The United States further asserts that the need to protect these records is diminished since it is likely that these matters will be disclosed by law to

the defendant and counsel in the future, and disclosure at this time may promote judicial economy and efficiency. The United States would also represent that these records are not obtainable from any other means.

For the foregoing reasons the United States respectfully requests this Court order the following:

- (1) that the United States be Ordered to disclose returns and return information obtained pursuant to this Court's Order for tax years December 31, 2018 through December 31, 2020 to defense counsel for their respective client; and
- (2) the parties or any witness to whom disclosure is made pursuant to this Order are subject to the same restrictions as those imposed by the discovery disclosure Order previously filed in this case<sup>1</sup>; and
- (3) that not later than the conclusion of the trial, guilty plea or other final resolution of this case in the District Court, all matters disclosed pursuant to this order are to be immediately returned to the United States.

Respectfully submitted,

COREY F. ELLIS  
UNITED STATES ATTORNEY

BY: s/Leesa Washington  
Leesa Washington (I.D. No. 06973)  
Assistant United States Attorney  
55 Beattie Place, Suite 700  
Greenville, South Carolina 29601  
Telephone: 864-282-2100

July 14, 2022

---

<sup>1</sup> See Standing Order Governing Discovery.